## IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

In re:		) Chapter 11
TPC GROUP INC., et al.,		) ) Case No. 22-10493 (CTG)
	Debtors. <sup>1</sup>	) ) Joint Administration Requested )

## NOTICE OF APPEARANCE AND DEMAND FOR SERVICE OF PAPERS

PLEASE TAKE NOTICE that the undersigned hereby appears in the above-captioned cases pursuant to Rule 9010(b) of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules") as counsel for Eclipse Business Capital LLC, as administrative agent and collateral agent for the ABL DIP Loans ("Eclipse") in the case of the above-captioned debtors and debtors in possession (the "Debtors"). Eclipse, pursuant to Bankruptcy Rules 2002, 9007 and 9010(b) and sections 102(1), 342 and 1109(b) of title 11 of the United States Code, requests (i) that all notices given or required to be given in these cases and all papers served or required to be served in these cases be given to and served upon the undersigned attorneys, at the addresses set forth below and (ii) that the undersigned attorneys be added to the mailing matrix on file with the Clerk of the Bankruptcy Court and any claims and noticing agent as set forth below:

headquarters and mailing address is 500 Dallas St., Suite 2000, Houston, Texas 77002.

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The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: TPC Group Inc. (3618); TPC Holdings, Inc. (7380); TPC Group LLC (8313); Texas Butylene Chemical Corporation (7440); Texas Olefins Domestic International Sales Corporation (4241); TPC Phoenix Fuels LLC (9133); Port Neches Fuels, LLC (1641); and TP Capital Corp. (6248). Each Debtor's corporate

Dimitri G. Karcazes, Esq. Prisca M. Kim, Esq. Nicole P. Bruno, Esq.

GOLDBERG KOHN LTD.

55 East Monroe Street, Suite 3300 Chicago, Illinois 60603-5792

Telephone: (312) 201-4000 Facsimile: (312) 332-2196

Email: dimitri.karcazes@goldbergkohn.com

prisca.kim@goldbergkohn.com nicole.bruno@goldbergkohn.com Jeremy W. Ryan (DE Bar No. 4057) Aaron H. Stulman (DE Bar No. 5807) POTTER ANDERSON & CORROON LLP

1313 N. Market Street, 6<sup>th</sup> Floor Wilmington, Delaware 19801-3700

Telephone: (302) 984-6000 Facsimile: (302) 658-1192

Email: jryan@potteranderson.com astulman@potteranderson.com

PLEASE TAKE FURTHER NOTICE that the foregoing demand includes not only the notices and papers referred to in the Bankruptcy Rules specified above, but also includes, without limitation, orders and notices of any application, motion, petition, pleading, request, complaint or demand, whether formal or informal, whether written or oral, and whether transmitted or conveyed by mail, delivery, telephone, telegraph, telex, facsimile transmission, electronic mail or otherwise, which (i) affect the Debtors or property of the Debtors or (ii) affect the rights of Eclipse, including by requiring any act, delivery of any property, payment or other conduct by Eclipse.

**PLEASE TAKE FURTHER NOTICE** that this Notice of Appearance includes and constitutes a request to be served with each and every plan and disclosure statement which is filed herein by any person or entity.

PLEASE TAKE FURTHER NOTICE that this Notice of Appearance and Request for Service of Papers and any later appearance, pleading, claim or suit shall not be deemed to be a waiver of the rights of Eclipse (1) to have final orders in non-core matters entered only after de novo review by a United States District Court judge, (2) to trial by jury in any proceeding so triable in these cases or any case, controversy, or proceeding related to these cases, (3) to ask the United States District Court to withdraw the reference in any matter subject to mandatory or discretionary withdrawal, (4) to ask the United States District Court to issue final orders or judgments if it is

determined that the Court, absent consent of the parties, cannot enter final orders or judgments consistent with Article III of the United States Constitution or (5) to have documents served in accordance with Federal Rule of Bankruptcy Procedure 7004 and Federal Rule of Civil Procedure 4, or to any other rights, claims, actions, defenses, setoffs, or recoupments, under agreements, in law, in equity or otherwise.

Dated: June 1, 2022

Wilmington, Delaware

## POTTER ANDERSON & CORROON LLP

/s/ Jeremy W. Ryan

Jeremy W. Ryan (DE Bar No. 4057) Aaron H. Stulman (DE Bar No. 5807) 1313 N. Market Street, 6th Floor Wilmington, Delaware 19801-3700

Telephone: (302) 984-6000 Facsimile: (302) 658-1192

Email: jryan@potteranderson.com astulman@potteranderson.com

and

Dimitri G. Karcazes, Esq. Prisca M. Kim, Esq. Nicole P. Bruno, Esq. GOLDBERG KOHN LTD. 55 East Monroe Street, Suite 3300 Chicago, Illinois 60603-5792 Telephone: (312) 201-4000

Facsimile: (312) 332-2196

Email: dimitri.karcazes@goldbergkohn.com prisca.kim@goldbergkohn.com nicole.bruno@goldbergkohn.com

Counsel for Eclipse Business Capital LLC, as Administrative Agent and Collateral Agent for the ABL DIP Loans